

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

CLINTON STRANGE,

Plaintiff

v.

3:22-cv-58-FDW

NEXT CLICK PARTNERS, LLC;

an Illinois Domestic Limited Liability Company

&

Does Nos. 1-10,

Defendants

*****JURY TRIAL DEMANDED*****

CIVIL ACTION COMPLAINT

FOR VIOLATIONS OF:

THE TELEPHONE CONSUMER PROTECTION ACT OF 1991

THE LOUISIANA CALLER ID ANTI-SPOOFING ACT OF 2009

&

THE NORTH CAROLINA UNSOLICITED ELECTRONIC BULK

COMMERCIAL MAIL ACT OF 2002

PRELIMINARY STATEMENTS:

1. The *pro se* Plaintiff CLINTON STRANGE ("PLAINTIFF") brings suit against Defendant NEXT CLICK PARTNERS, LLC ("NEXT CLICK" or "DEFENDANT") for their role in placing, initiating and or making spoofed autodialed telemarketing calls to Plaintiff's federal and state Do-Not-Call List registered cellphone utilizing an Automatic Telephone Dialing System

(“ATDS”) in violation of the Telephone Consumer Protection Act of 1991 (“TCPA”), and for their role in causing the Plaintiff to receive unsolicited bulk commercial electronic mail spam to his electronic mail address in violation of The North Carolina Unsolicited Electronic Bulk Commercial Mail Act of 2002 (N.C. anti-spam statute).

2. Plaintiff seeks to recover the greater of his Actual and or Statutory Damages; Injunctive Relief Enjoining Defendants from future violations; Recovery of all costs, expenses and or fees associated with bringing and litigating the action to judgment, together along with pre and or post-judgment interest as allowable by law.

JURISDICTION & VENUE:

3. Jurisdiction primarily arises in this U.S. District Court under a federal question as the TCPA is a federal statute pursuant to 28 U.S. Code § 1331.
4. Diversity Jurisdiction is raised by Plaintiff as the State Law Claims made by Plaintiff allege an amount in controversy exceeding \$75,000 and Plaintiff is a completely diverse citizen of a state that differs from Next Click and or the unnamed Does Nos. 1-10 pursuant to 28 U.S. Code § 1332.
5. Supplemental Jurisdiction would be properly applied, even if Diversity Jurisdiction faileth or is otherwise destroyed, because the Plaintiff’s state law claims arise out of the same set and nucleus of operative facts as those

that are under a federal question, and the actions and or omissions giving rise to the Plaintiff's state law claims affected inter-state commerce pursuant to 28 U.S. Code § 1367.

6. Venue lies proper in this U.S. District because Defendant Next Click has a 'Partner' and office in Buncombe County, NC, and the offending emails were made from Mecklenburg County, NC pursuant to 28 U.S. Code § 1391.

THE PARTIES:

7. Plaintiff CLINTON STRANGE is an adult individual residing at the address of:

CLINTON STRANGE
7021 WINBURN DRIVE
GREENWOOD, LA 71033

8. Defendant NEXT CLICK PARTNERS, LLC is an Illinois Domestic Limited Liability Company. According to Next Click's LinkedIn page they self-describe as follows: "We are a fast-growing advertising technology company with offices in Chicago and North Carolina. We have years of experience and expertise in customer acquisition in verticals such as finance, housing support, benefits, grants, legal, insurance, education, jobs, and many others." Among other websites the Defendant operates and or owns, benefitsdepot.net is a website registered to, operated by, and or owned by

Defendant Next Click. According to the Illinois Secretary of State this Defendant has a principal place of business located at:

NEXT CLICK PARTNERS, LLC
422 9TH ST
WILMETTE, IL 60091

FACTUAL ALLEGATIONS:

Historical Background Leading up to the Actionable Incidents

9. In or around May 28, 2002, the Plaintiff became injured as a result of an in-service incident at Fort. Leonardwood, Missouri.
10. Between the Winter season of 2018 and the Spring Season of 2019, the Plaintiff began a regiment of experimental psychotropic drugs and utilized neurological stimulating devices to aid and or treat the Plaintiff's service-connected chronic pain conditions. These medical aid devices and medications caused the Plaintiff to become frequently imbalanced and subject to falls – to wit, the Plaintiff's Clinicians and Physicians at the Overton Brooks VA Medical Center in Shreveport, Louisiana consistently rated Plaintiff as a Moderate "*fall-risk*" with a rating of between "40" and "65" prior to April 2019.
11. Plaintiff recollects that his Physical Therapist (Latonya Brown) recommended that the Plaintiff reach out to the VA's Prosthetics and Sensory Aid's Department and obtain some "grab-bars" so Plaintiff could

install them in parts of his home where falls were likely to occur and to get a couple of extra cellphones to have nearby potential fall-risk locations in the event of a fall (so Plaintiff could call-for-help).

12. On April 4, 2019, the Plaintiff (following the advice of his VA Physical Therapist) subscribed to the Verizon Wireless Cellphone No. 318-780-8890.

13. On April 4, 2019, the Plaintiff registered his new residential Cellphone No. 318-780-8890 with the Louisiana Do-Not-Call Program and the U.S. Federal Trade Commission's Do-Not-Call List on April 4, 2019.

The Documented Incidents Giving Rise to the Complaint

14. On or before March 2021, the Plaintiff had been in regular contact with both the General Leonard Wood Army Community Medical Center f/k/a General Leonard Wood Army Community Hospital (GLWACH) and the Defense Finance and Accounting Service Office (DFAS) at Fort Leonard Wood, Missouri in order to advance Plaintiff's VA Disability Claims. Plaintiff recollects that he provided GLWACH and DFAS with his 318-780-8890 cellphone as a primary or secondary contact number.

15. On March 11, 2021, at 12:54pm CST the Plaintiff received a text message on his cellphone number 318-780-8890 from a number appearing in the Caller ID as 573-955-0166. The Plaintiff represents that the below image Labeled Figure A is a true and accurate representation of his cellphone's

screen in regard to the *alleged* text message herein. Plaintiff recognized the area code as being from “573” associated with Missouri and presumed the communication to be associated with the Army, or the Army Base. The message read: “FamilyAssistance: Have you been at a disadvantage economically because of the pandemics? Say “OK” back - for some more assistance now or stop to quit”

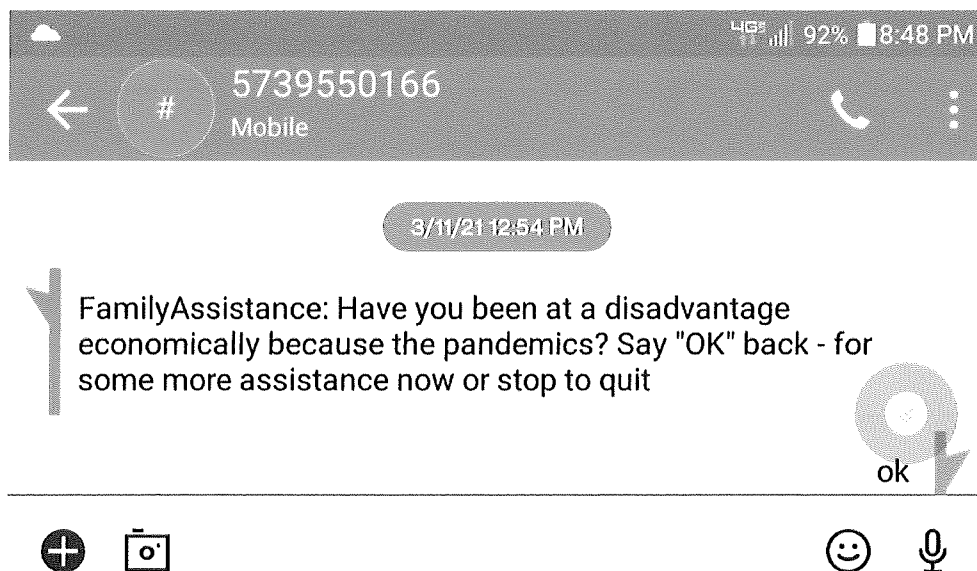


Figure A

16. The Plaintiff, for the reasons described above, texted back “*ok*” to the text message sender. The sender texted Plaintiff back with an abbreviated URL Hyperlink of familynow10.info/fnFB as depicted in the below Figure B. Plaintiff “clicked” on the link and was redirected to a website called Resources4Relief.com which appeared to be a Government Agency

Imposter page. Featuring a picture of the Whitehouse and espousing their ability to help consumers obtain Federal Benefits etc... Plaintiff attempted to email Resources4Relief.com a Do-Not-Call Demand, but the (2) emails to the addresses in their “privacy” page section both bounced-back. The Plaintiff texted back “Stop” to the long-code number 573-955-0166 on March 11, 2021, at 1:08pm CST, but never received a reply. Plaintiff tried telephoning the (573-955-0166) number back to issue an oral Do-Not-Call request but was met with a pre-recorded voice message indicating that the number was assigned to an “Answer URL” Device system (perhaps Twilio).

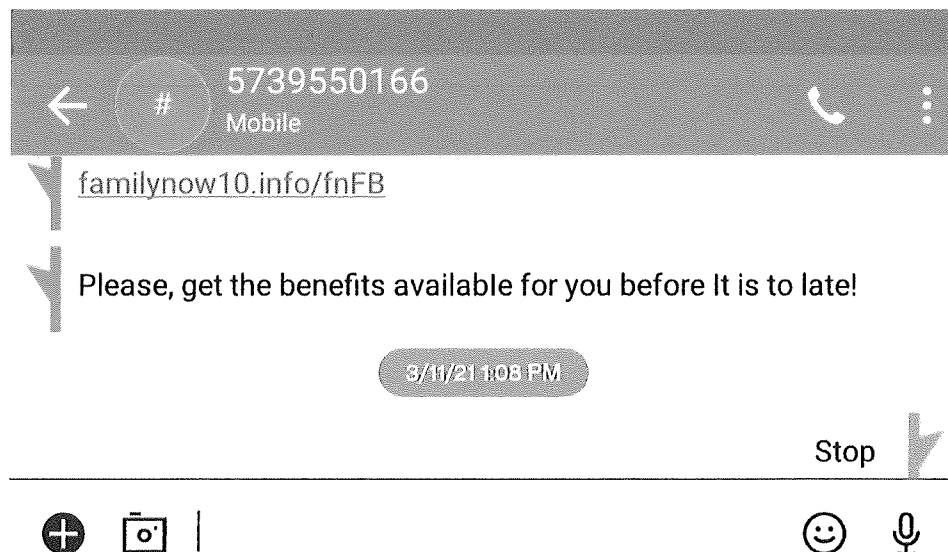


Figure B

17. On March 31, 2021, at 4:58pm CST, Defendant Next Click acting by and through its agents, servants and or employees placed and or initiated an autodialed text message (call) to the Plaintiff’s Do-Not-Call list registered

Verizon Wireless cellphone number 318-780-8890 utilizing an ATDS from a spoofed long-code number appearing on the Caller ID as 832-219-2130. The message read as follows: ““Anja you might have THOUSANDS in RESOURCES at “Resources4Me”! Please click the link and verify your NAME and EMAIL to see How much is owed YOU: cellphcash.info/fFvf”” as depicted below in Figure C.

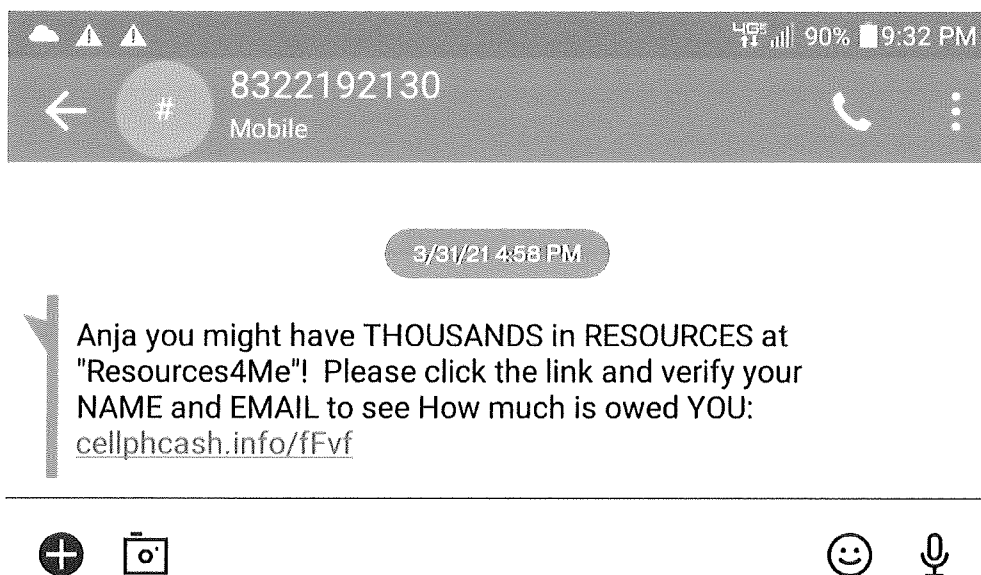


Figure C

18. On April 1, 2021, at 12:24pm CST, Defendant Next Click acting by and through its agents, servants and or employees placed and or initiated an autodialed text message (call) to the Plaintiff’s Do-Not-Call list registered Verizon Wireless cellphone number 318-780-8890 utilizing an ATDS from a spoofed long-code number appearing on the Caller ID as 832-361-1718. The

message read as follows: “Anja may have Cash on your Ph Today
cellphcash.info/9P5A” as depicted below in Figure D.

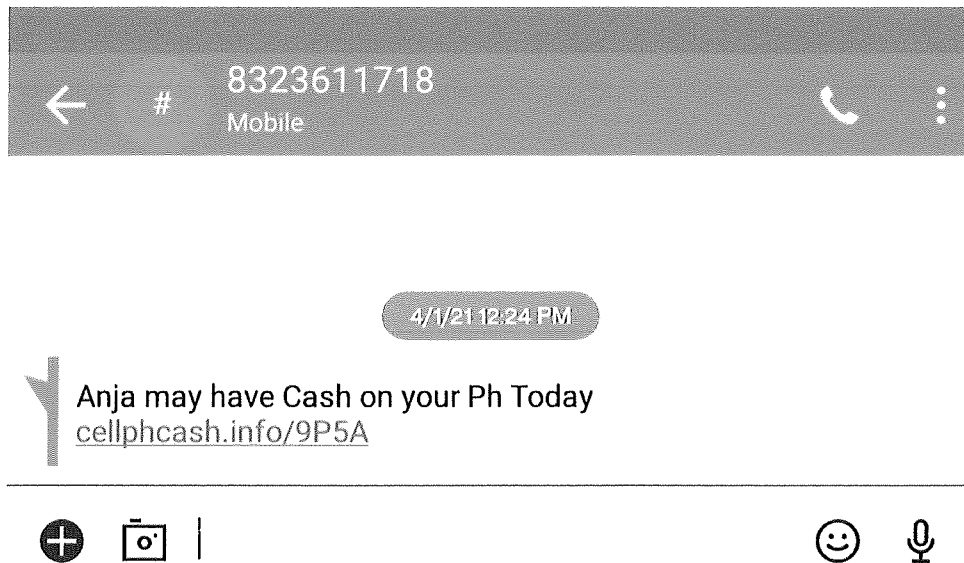


Figure D

19. On April 3, 2021, at 1:31pm CST, Defendant Next Click acting by and through its agents, servants and or employees placed and or initiated an autodialed text message (call) to the Plaintiff’s Do-Not-Call list registered Verizon Wireless cellphone number 318-780-8890 utilizing an ATDS from a spoofed long-code number appearing on the Caller ID as 470-980-5136. The message read as follows: “Anja may have Cash on ur Mobile Shortly cellphcash.info/gpuSM” as depicted below in Figure E.

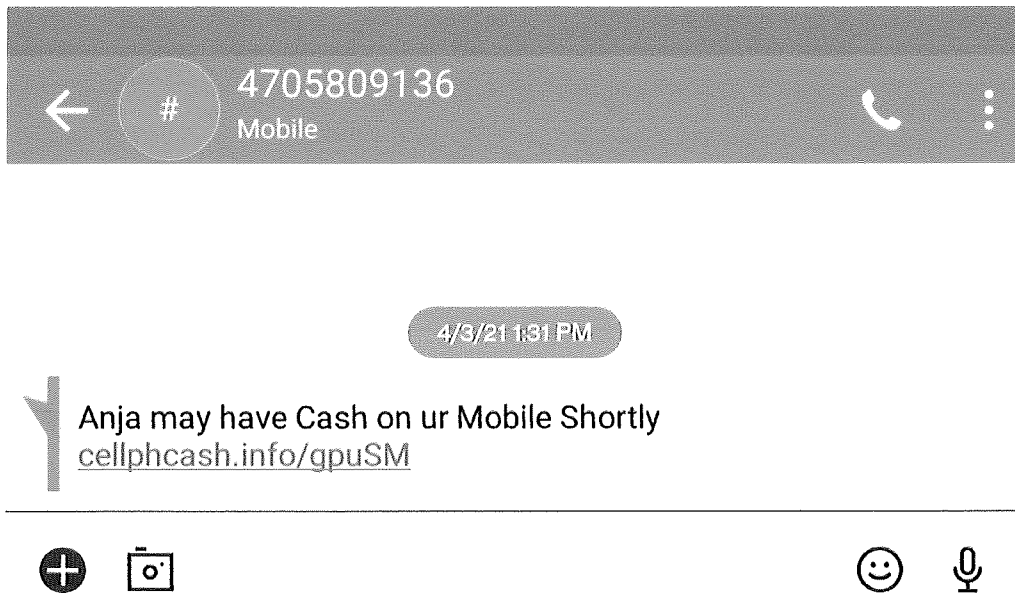


Figure E

20. On April 5, 2021, at 9:30pm CST (After the FCC Curfew), Defendant Next Click acting by and through its agents, servants and or employees placed and or initiated an autodialed text message (call) to the Plaintiff's Do-Not-Call list registered Verizon Wireless cellphone number 318-780-8890 utilizing an ATDS from a spoofed long-code number appearing on the Caller ID as 501-514-2624. The message read as follows: "Anja Did the Pandemic affect you financially? Help may be available !!! THOUSANDS available HERE: cellphcash.info/UoGwoi" as depicted below in Figure F.

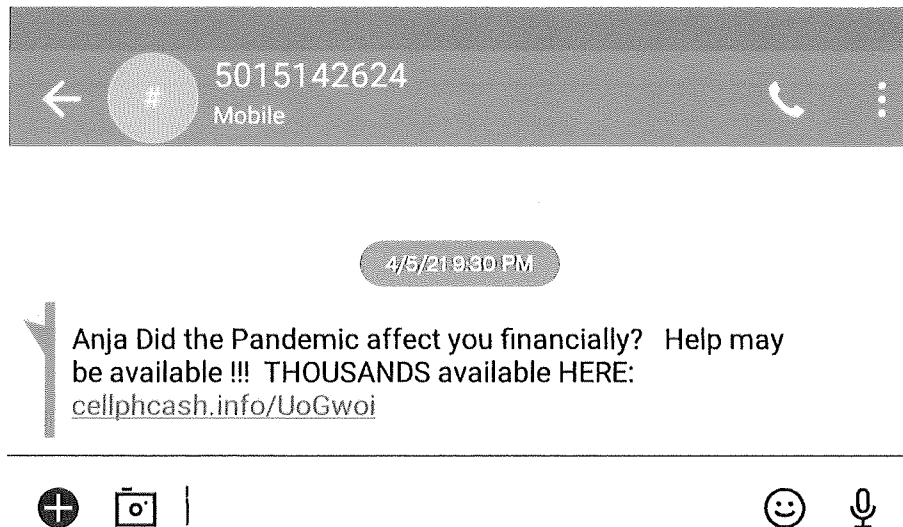


Figure F

21. On April 6, 2021, at 10:15am CST, Defendant Next Click acting by and through its agents, servants and or employees placed and or initiated an autodialed text message (call) to the Plaintiff's Do-Not-Call list registered Verizon Wireless cellphone number 318-780-8890 utilizing an ATDS from a spoofed long-code number appearing on the Caller ID as 424-202-9671. The message read as follows: "Anja may have Cash on ur Ph Here cellphcash.info/F9Om" as depicted below in Figure G.

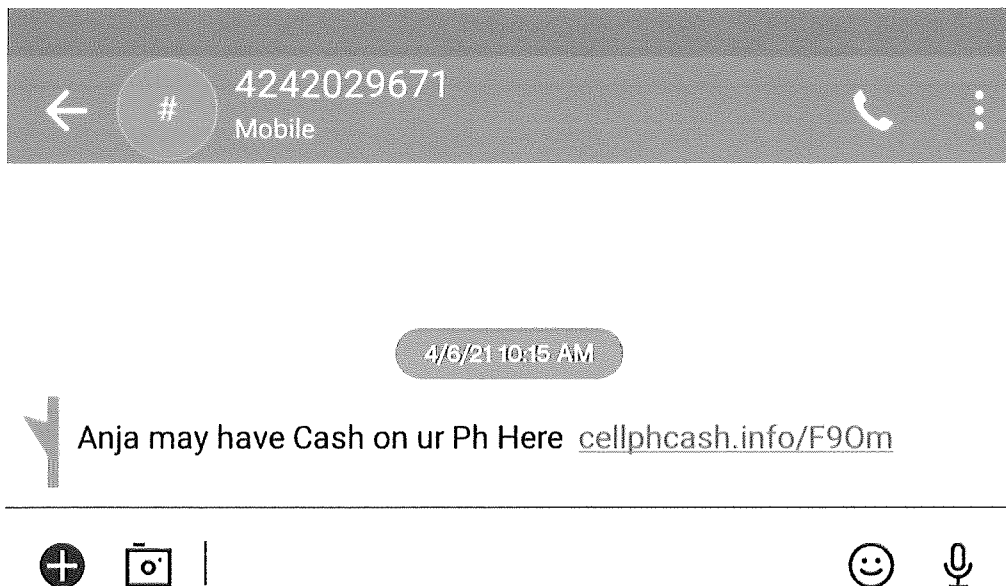


Figure G

22. On April 6, 2021, at 12:29pm CST, Defendant Next Click acting by and through its agents, servants and or employees placed and or initiated an autodialed text message (call) to the Plaintiff's Do-Not-Call list registered Verizon Wireless cellphone number 318-780-8890 utilizing an ATDS from a spoofed long-code number appearing on the Caller ID as 470-829-9360. The message read as follows: "Anja Grants are available this Year for You!!! They do NOT need to be repaid!!! See how MUCH Here : cellphcash.info/HoFGD" as depicted below in Figure H.

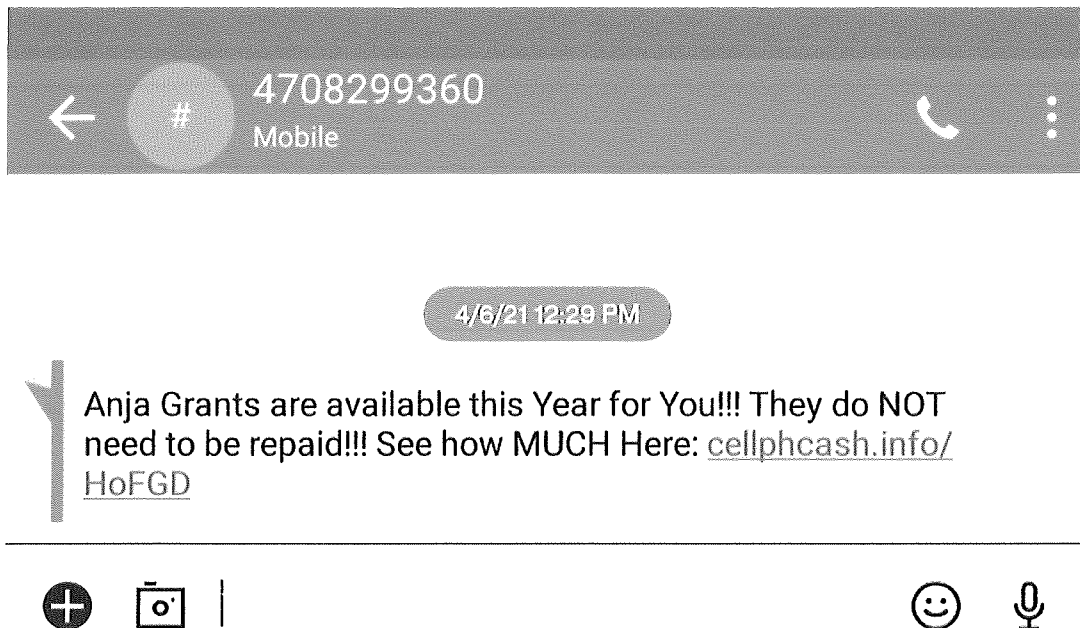


Figure H

23. On April 6, 2021, at 8:49pm CST, Defendant Next Click acting by and through its agents, servants and or employees placed and or initiated an autodialed text message (call) to the Plaintiff's Do-Not-Call list registered Verizon Wireless cellphone number 318-780-8890 utilizing an ATDS from a spoofed long-code number appearing on the Caller ID as 424-202-0207. The message read as follows: "Anja you might have THOUSANDS in RESOURCES at "Resources4Me"! Please click the link and verify your NAME and EMAIL to see How much is owed YOU: cellphcash.info/4kDp" as depicted below in Figure I.

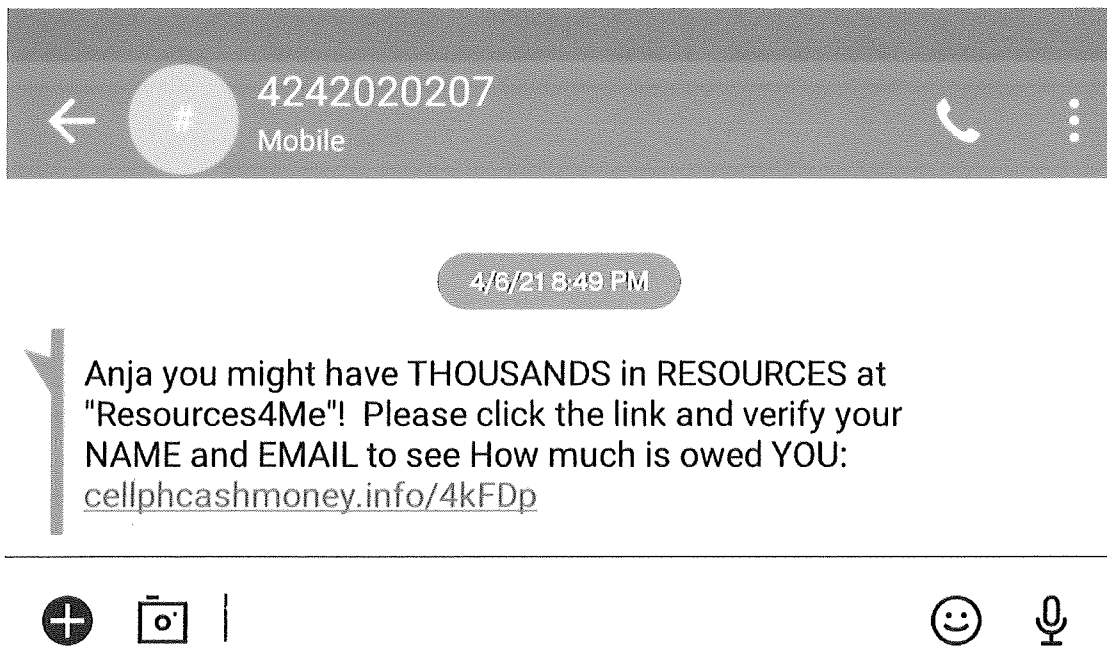


Figure I

24. On April 7, 2021, at 2:56pm CST, Defendant Next Click acting by and through its agents, servants and or employees placed and or initiated an autodialed text message (call) to the Plaintiff's Do-Not-Call list registered Verizon Wireless cellphone number 318-780-8890 utilizing an ATDS from a spoofed long-code number appearing on the Caller ID as 405-779-3138. The message read as follows: "Anja Grants are available this Year for You!!! They do NOT need to be repaid!!! See how MUCH NOW : cellphcashmoney.info/juHMw" as depicted below in Figure J.

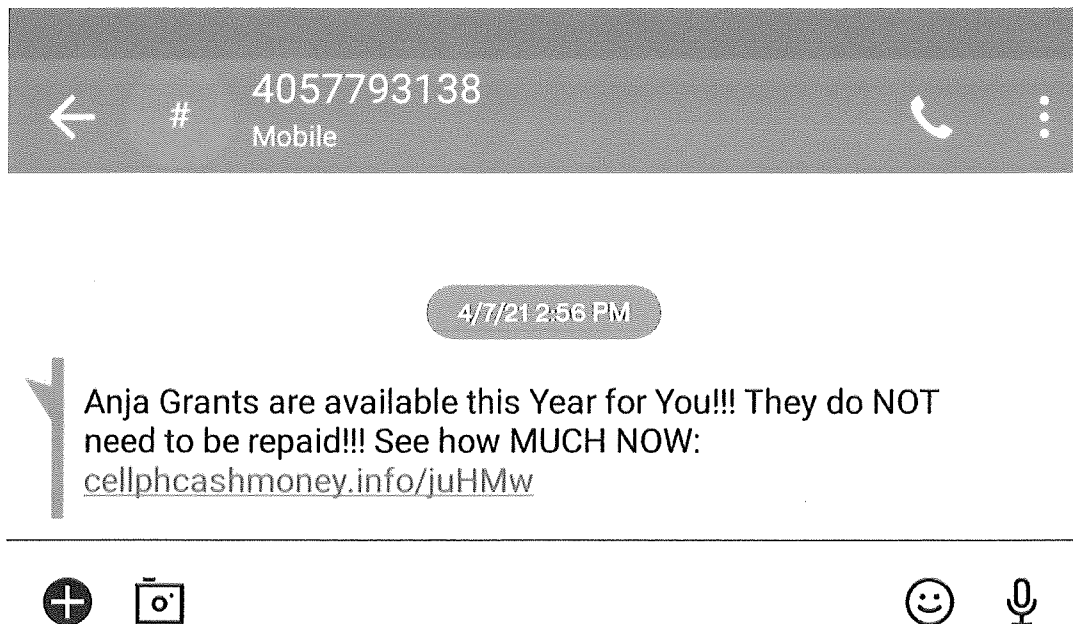


Figure J

25. On April 8, 2021, at 5:45pm CST, Defendant Next Click acting by and through its agents, servants and or employees placed and or initiated two (2) random fired back-to-back autodialed text messages (calls) to the Plaintiff's Do-Not-Call list registered Verizon Wireless cellphone number 318-780-8890 utilizing an ATDS from a spoofed long-code number appearing on the Caller ID as 405-779-9692. The messages both read as follows: "Anja may have Cash on your Phone Shortly cellphfunds.info/mWo7" as depicted below in Figure K.

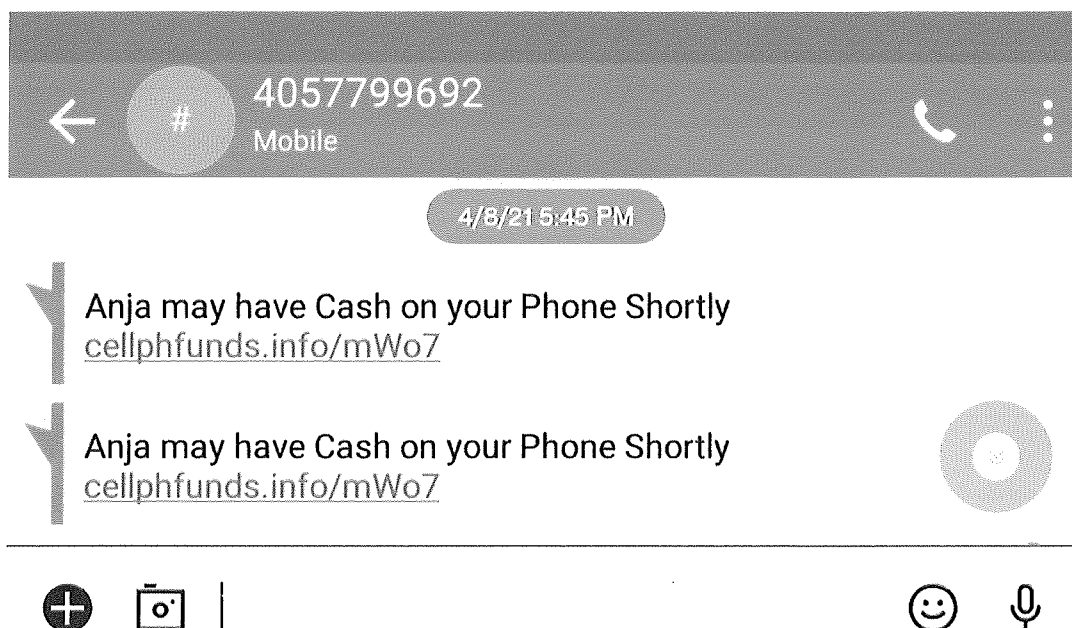


Figure K

26. On April 7, 2021, at 4:48pm CST, Defendant Next Click acting by and through its agents, servants and or employees placed and or initiated an autodialed text message (call) to the Plaintiff's Do-Not-Call list registered Verizon Wireless cellphone number 318-780-8890 utilizing an ATDS from a spoofed long-code number appearing on the Caller ID as 405-779-3138. The message read as follows: "Anja Did the Recession affect you financially? [Bag of Cash Emoji] Grants may be available!!! THOUSANDS available HERE: cellphcashmoney.info/qKwn" as depicted below in Figure L.

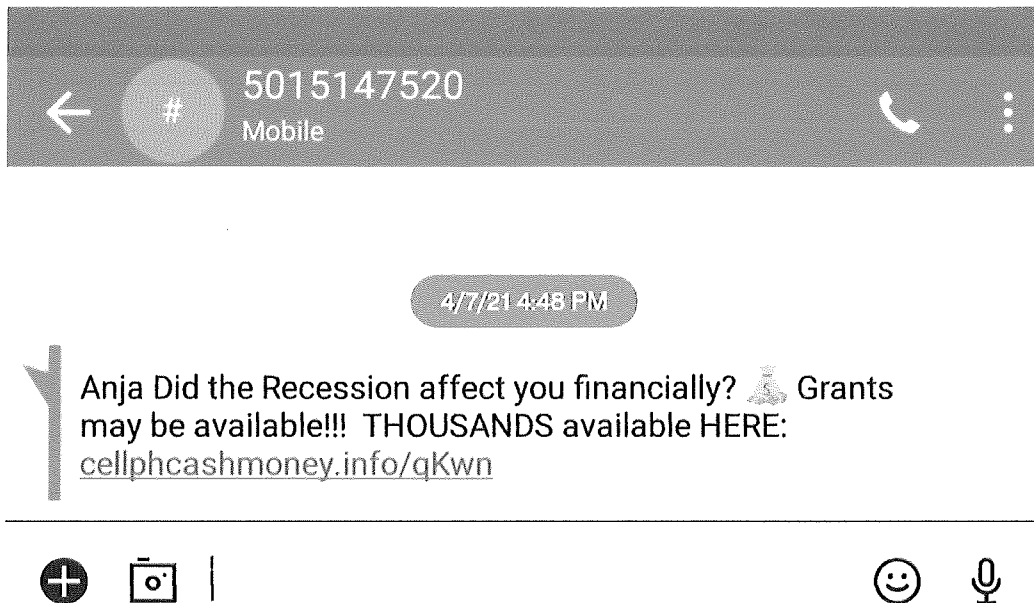


Figure L

27. When the Plaintiff would “click” the Hyperlinks as described in above paragraphs 17-26 he was redirected to benefitsdepot.net. After several hours of exhaustive research, the Plaintiff was able to discover that the website benefitsdepot.net is a website operated by Defendant Next Click. Plaintiff drafted a letter to Next Click’s Illinois Registered Agent (Mr. Michael Black, Esq.), and received a reply in regard to his communication from Mr. Jack Murphy (a Next Click Partner Officer/Partner) on April, 14, 2021 at 8:42am CST via electronic mail that stated to the effect that Next Click knew who sent the allegedly offending autodialed text messages, and in a later follow-up email response to Plaintiff’s inquiry for the identity of the sender stated that Next Click does not identify their publishers.

28. On or around May 2021 to July 2021 ((On three (3) separate dates))

Defendant Next Click acting by and through its agents, servants and or employees placed and or initiated a number of bulk commercial electronic mail messages to the Plaintiff's email address

(caddobossierrefrigeration@gmail.com) in order to promote Defendant Next Click's website benefitsdepot.net or encourage the purchase of the products, goods, and or services offered by Defendant Next Click's clients.

29. Defendant never provided Next Click or any of its vendors, publishers, and or affiliates with Plaintiff's email address

(caddobossierrefrigeration@gmail.com).

30. In the bottom of the emails would appear the address of "610 Jetton #120, #1001, Davidson, NC 28036.

31. The three (3) unsolicited bulk commercial emails that Plaintiff can identify were sent from fake electronic mail addresses and contained false and misleading information as to the validity of the claims of the offerings contained within in direct violation of the North Carolina Unsolicited Electronic Bulk Commercial Mail Act of 2002.

Plaintiff's Allegations of ATDS Utilization

32. Each of the autodialed Robotexts listed in paragraphs 17-26 were placed, initiated, and or made utilizing an automatic telephone dialing system

(“ATDS”). Plaintiff knows that an ATDS was being utilized because [i]t would be necessary to “spoof” and or manipulate the Caller ID information in the Caller ID field to Randomly and or Sequentially Produce via a Number Generator Technology and or Platform. Plaintiff at some time, (perhaps in April 2021) dialed back to each and every one of the numbers listed in the Caller ID fields in regard to the Robotexts listed in paragraphs 17-26 and was met with a standard “*dis-connected or no longer in-service*” message indicating that the Caller ID information was in fact spoofed and or manipulated.

33. Further, Plaintiff knows that the autodialed Robotexts listed in paragraphs 17-26 (the autodialed Robotexts listed in paragraphs 17-26) the Caller ID was spoofed and an ATDS was being utilized because no stop/ help instructions were included at the end of the text messages, although ample character space was available.

34. Plaintiff knows that an ATDS was being utilized because of the abbreviated short code URL usage. Plaintiff alleges that on documented occasions as cited in paragraphs 17-26 the abbreviated URL appeared as:

- a- cellphcash.info/fFvf
- b- cellphcash.info/9P5A
- c- cellphcash.info/gpuSM
- d- cellphcash.info/UoGwoi
- e- cellphcash.info/F9Om

- f- cellphcash.info/HoFGD
- g- cellphcash.info/4kDp
- h- cellphcashmoney.info/juHMw
- i- cellphfunds.info/mWo7
- j- cellphcashmoney.info/qKwn

, instead of the (Next Click) assigned coded affiliate hyperlink (for example):

https://benefitsdepot.net/lander/explore?affiliate_id=79&transaction_id=2d318407041548b199c1aecbf58dbc0&sub1=1406&sub2=102d90ea6147f845f61bfabdf7f936&sub3=&sub4=&sub5=sms&firstname=&lastname=&email=&phone1=&channel=sms

COUNTS & CAUSES OF ACTION:

COUNT I:

(Plaintiff v. Next Click)

Willful & Knowing Violations of the TCPA

47 U.S. Code § 227 Subsection (b)

35.Plaintiff incorporates all the foregoing paragraphs as though the same were set forth at length herein.

36.Defendant Next Click (acting by and through their agents, servants and or employees) placed at least 10 (Ten) unwanted autodialed Robotexts (calls) to the Plaintiff's Verizon Wireless cellphone number 318-780-8890 since March 2021:

- a- March 31, 2021, at 4:48pm CST
- b- April 1, 2021, at 12:24pm CST
- c- April 3, 2021, at 1:31pm CST

- d- April 5, 2021, at 9:30am CST
- e- April 6, 2021, at 10:15am CST
- f- April 6, 2021, at 12:29pm CST
- g- April 6, 2021, at 8:49pm CST
- h- April 7, 2021, at 4:48pm CST
- i- April 8, 2021, at 5:45pm CST – rapid fire 1 of 2
- j- April 8, 2021, at 5:45pm CST – rapid fire 2 of 2

37. The foregoing and within complained of Robotexts (calls) were made utilizing an automatic telephone dialing system that has, and in fact utilizes, the present capacity to randomly & sequentially generate phone numbers and (later) dial them via their ‘storage’ device randomly and sequentially.

38. As referenced in the Plaintiff’s above complaint the Defendant Next Click is directly or alternatively vicariously liable for all the calls that the Plaintiff has detailed herein under 47 U.S. Code § 227(b)(1)(A)(iii).

39. Defendant is liable to the Plaintiff for *at least* ten (10) violations under this Count totaling (10 x \$500) \$5,000, which the Court in its discretion could treble to \$15,000.

40. Plaintiff seeks both damages and injunctive relief enjoining Defendant from future violations under the TCPA’s trebling statutory provision [See 47 U.S. Code § 227(b)(3)(C), and 47 U.S. Code § 227(b)(3)(B)].

COUNT II:
(Plaintiff v. Next Click)

Willful & Knowing Violations of the TCPA

47 U.S. Code § 227 Subsection (c)

41. Plaintiff incorporates all the foregoing paragraphs as though the same were set forth at length herein.

42. Plaintiff's cellphone number is used solely as a residential number, and for household use such as a bed-side alarm clock, and in-home telemedicine tool, and a cooking timer for preparing meals.

43. Defendant Next Click placed at least ten (10) unwanted autodialed calls to the Plaintiff's Verizon Wireless cellphone number 318-780-8890 since March 2021 (as detailed in the above paragraph Nos. 17-26 & 36).

44. As referenced in the Plaintiff's above complaint the Defendant Next Click is directly or alternatively vicariously liable for 10 violations under this Count totaling (10 x \$500) \$5,000, which the Court in its discretion could treble to \$15,000 pursuant to 47 U.S. Code § 227©(5).

45. Plaintiff seeks both damages and injunctive relief enjoining Defendant from future violations under the TCPA's trebling statutory provision [See 47 U.S. Code § 227©(5)(B), and 47 U.S. Code § 227(c)(5)(C)].

COUNT III:

(Plaintiff v. Next Click)

Willful & Knowing Violations of the TCPA

47 U.S. Code § 227 Subsection (d)

46.Plaintiff incorporates all the foregoing paragraphs as though the same were set forth at length herein.

47.Defendant Next Click does not maintain a written Do-Not-Call Policy. Even if they ever did, they do not abide by the written policy as demonstrated above and herein.

48.Based on the foregoing Defendant Next Click is liable for damages to Plaintiff for \$500 (*treble - able* to \$1,500.00 at the Court’s discretion) for each and every violation the trier of fact deems Defendant Next Click liable to the Plaintiff for under this Count: (1) under 47 U.S. Code § 227(d) and 47 C.F.R. 64.1200(d)(2) – failing to maintain a do-not-call policy; and (2) 47 U.S. Code § 227(d)(4) and 47 C.F.R. 64.1200(d)(4) for “failure to identify”.

CAUSE OF ACTION No. IV:

(Plaintiff v. Next Click)

Willful & Knowing Violations of

THE LOUISIANA CALLER ID ANTI-SPOOFING ACT OF 2009

Louisiana Revised Statute 51: §1741.1 *et seq.*

49.Plaintiff incorporates all the foregoing paragraphs as though the same were set forth at length herein.

50. In 2009, The Louisiana Legislature passed the statute that forms the basis of this Cause of Action. The preamble of the statute reads “The legislature of

the state of Louisiana finds that the citizens of this state are potential targets of a telephone scam known as “caller ID spoofing” or “caller ID fraud,” which allows a caller to hide his or her true identity by modifying caller ID information with the intent to mislead, defraud, deceive, cause harm, or wrongfully obtain anything of value. It is, therefore, the intent of this Chapter to protect Louisiana citizens from such scams which have led to financial loss, the loss of personal information, harassment, and potentially threatening telephone calls.” Louisiana Revised Statute 51: §1741.1.

51. Even ‘so-called’ legitimate telemarketing that utilizes spoofed Caller ID tactics robs a consumer of the ability to identify a liable Defendant, and or bring a civil suit to enforce state statutes, and or the TCPA. The FCC in a number of orders and notices has detailed and articulated that that ability to bring a civil suit or have liability determined qualifies as a “thing of value” capable of measurement – in other words ‘*actual damages*’.

52. Defendant Next Click placed at least ten (10) unwanted, unsolicited, and spoofed autodialed Robotexts (calls) to the Plaintiff’s Verizon Wireless cellphone number 318-780-8890 since March 2021 (as detailed in the above paragraph Nos. 17-26 & 36).

53. As referenced in the Plaintiff’s above complaint the Defendant Next Click is directly or alternatively vicariously liable for 10 (ten) violations under this

Cause of Action, which the Court in its discretion could award an enhanced civil penalty of *up to* \$10,000 *per violation* pursuant to Louisiana Revised Statute 51: §1741.5, or three times the Plaintiff's Actual Damages, or only injunctive relief.

54. Plaintiff invokes Louisiana Civil Code Article 2324.1 which states: "in the assessment of damages in cases of offenses, quasi offenses, and quasi contracts, much discretion must be left to the judge or jury."

CAUSE OF ACTION No. V:

(Plaintiff v. Next Click)

Willful & Knowing Violations of

N.C. GEN. STAT. §§ 14-453 *et seq.*

**NORTH CAROLINA UNSOLICITED ELECTRONIC BULK
COMMERCIAL MAIL ACT OF 2002**

55. Plaintiff incorporates all the foregoing paragraphs as though the same were set forth at length herein.

56. Defendant Next Click hired and or contracted with a Doe marketing agent to mass disseminate a bulk electronic mail marketing campaign blast.

57. Plaintiff was the recipient of at least three (3) of those bulk commercial electronic mail messages transmitted by a Doe sender who utilized a Mecklenburg County, North Carolina physical address of 610 Jetton #120,

#1001 Davidson, NC 28036 on three (3) separate dates between May 2021 and July 2021.

58. The entity that Defendant contracted with apparently has been engaged in mass emails for some time. The Better Business Bureau Webpage for this entity's alias or alter-ego name is as below respectively:

- http://www.russiagirlsonline.today/qa/register04.php?aid=1282&oid=CP254071&qpid_offer_id=RGT_84172
- <https://www.bbb.org/us/nc/davidson/profile/adult-entertainment/russian-women-0473-744891/complaints>

59. Defendant Next Click is liable to the Plaintiff for \$25,000 *per day* that the trier of fact determines that he received unsolicited bulk commercial electronic mail messages transmitted by or alternatively on behalf of Defendant Next Click.

60. Defendant Next Click is jointly and or vicariously liable to Plaintiff in aggregate for \$75,000 under this Cause of Action.

PRAYER FOR RELIEF:

*****PLAINTIFF DEMANDS TRIAL BY JURY*****

Wherefore, the Plaintiff seeks judgment in Plaintiff's favor and damages against Defendant/s based on the following requested relief:

Actual Damages;

Statutory Damages;

Trebled Damages;

Stacked Damages;

Trebled Actual and or Enhanced Civil Damages (under Louisiana Law);


Injunctive Relief Enjoining Defendant from Future Violations;

Costs, Expenses, and Fees associated with Litigating the Action to Judgment;

Pre and or Post Judgment Interest as Allowable by Law;

, and such other and further relief the Court deems necessary, just and proper.

Respectfully Submitted,

X 
Clinton Strange

Pro Se

7021 Winburn Drive

Greenwood, LA 71033

(318) 423-5057

StrangeC982@gmail.com

2-4-2022

Dated